

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	}	
UNITED STATES OF AMERICA	}	
	}	
V.	}	CRIMINAL NO.
	}	04-10165-RCL
TONY GOMES TEXEIRA	}	
DEFENDANT	}	
_____	}	

**DEFENDANT’S MOTION IN LIMINE**

Now comes the Defendant, Tony Gomes Texeira, in the above-numbered indictment, and hereby moves this court for an order precluding the elicitation of evidence that the officers involved in the arrest of the Defendant were involved in or attached to the “Anti Gang Unit”, “Anti-Gang Enforcement Unit” or “The Great Unit” (gang reference) or that the area in which the vehicle was stopped is a “high crime area”.

Further, the Defendant moves that no reference is made to “knowing” the Defendant by either experience or reputation be testified to by the government’s witnesses. As reasons, the Defendant contends that the above are neither inadmissible nor relevant and would cause undue prejudice to the Defendant.

Date: July 12, 2006

Tony Gomes Texeira,  
By his attorney,

/s/ Frank D. Camera, Esq.

**CERTIFICATE OF SERVICE**

I hereby I have served the foregoing on all counsel of record on this date.

/s/ Frank D. Camera